Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

National Emission Standards for Hazardous Air Pollutants 40 CFR Part 63, Subpart HHHHHH (6H)

Compliance Assessment Checklist

Date: _____

Company:	
Facility Address:	
Facility:	
Check all boxes that apply to the facility: ☐ Paint Stripping using MeCl ☐ Motor Vehicle & Mobile Equipment Surface Coating ☐ Miscellaneous Surface Coating	
Facility Representative & Title:	**Phone:**
SBEAP Staff:	

Paint Stripping using MeCl (Methylene Chloride)

Y	**N**	Each application is evaluated to ensure there is a need for paint stripping.
Y	**N**	Each application using MeCl is evaluated to ensure no other alternative can be used instead.
Y	**N**	Exposure to the air is reduced for MeCl paint strippers.
Y	**N**	Application conditions are optimized to reduce MeCl evaporation.
Y	**N**	Proper storage and disposal of MeCl paint strippers is practiced.
If facility uses more than one ton of MeCl per year:		
Y	**N**	A written MeCl Minimization Plan to minimize the use and emissions of MeCl has been developed and implemented.
Y	**N**	The Minimization Plan addresses, at a minimum, the five management practices listed in previous section above.
Y	**N**	A placard or sign outlining the Minimization Plan is posted in each area where MeCl stripping occurs.
Y	**N**	A copy of the current Minimization Plan is maintained on site at all times.
Y	**N**	The Minimization Plan is reviewed annually.
Y	**N**	Records are kept of the annual review of the Minimization Plan and any updates made.
MeCl Records:		
Y	**N**	Records are kept yearly on the type of paint stripper used and amount of MeCl in each paint stripper.
Y	**N**	Annual MeCl paint stripper usage is verified by documentation (for example: safety data sheets or other manufacturer/supplier information; purchase receipts; records of paint stripper usage; or calculations).
Y	**N**	Copies of annual usage of MeCl paint strippers are kept at all times.
Notes:		

Miscellaneous Surface Coating, Motor Vehicle & Mobile Equipment Surface Coating Management Practices

Y	**N**	Coatings are applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or equivalent technology.
Y	**N**	All spray-applied coatings are applied in a preparation station, spray booth, or mobile enclosure equipped with a filter that achieves ≥ 98 percent capture of paint overspray.
Y	**N**	**Refinishing of complete motor vehicles and mobile equipment:** Spray booths and prep stations are fully enclosed with a full roof; four complete walls or complete side curtains; and ventilated at negative pressure to draw air into any openings in the booth walls or prep station curtains.

DISCLAIMER: This checklist may not include all requirements of 40 CFR Part 63, Subpart HHHHHH

Management Practices (continued)		
Y	**N**	**Miscellaneous parts/products or vehicle subassemblies:** Spray booths and prep stations have a full roof; at least three complete walls or side curtains; and ventilated to draw air into the booth.
Y	**N**	**Mobile ventilated enclosures used for spot repairs:** Encloses and, if necessary, seals against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.
Y	**N**	Spray guns are cleaned by methods that do not create an atomized mist or spray of gun cleaning solvent; the method also does not create paint residue outside of a container that collects used gun cleaning solvent. Such methods include a fully enclosed spray gun cleaner, cleaning disassembled gun parts by hand, flushing solvent through the gun without atomizing the solvent and paint residue, or a combination of non-atomizing methods.
Y	**N**	Documentation records of spray booth filter-efficiency are kept.
Painter Training		
Y	**N**	All painters have been trained and certified in proper spray application of surface coatings and proper setup and maintenance of spray equipment.
Y	**N**	Hands-on and classroom training includes at a minimum: 1) Spray gun equipment selection, set up, and operation; 2) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray; 3) Routine spray booth and filter maintenance; and, 4) Compliance with Subpart 6H requirements.
Y	**N**	A list is maintained of all current painters by name and job description that are required to be trained.
Y	**N**	All painters have completed training no later than 180 days after being hired.
Y	**N**	All painters have completed refresher training at least once every five years.
Y	**N**	Training certifications are retained and include the dates of the initial training and any refreshers.
All Facilities – Notifications, Reports, and Records		
Y	**N**	New facilities: The Notification of Compliance Status was submitted within 180 days after startup.
Y	**N**	Existing facilities: The Notification of Compliance Status has been submitted.
Y	**N**	Records are kept on any deviation from Subpart 6H requirements, including date, time, description, and corrective action taken.
Y	**N**	Annual Notification of Changes Report has been submitted each year if changes occurred in the Notification of Compliance Status, past annual reports, or deviations from requirements for training and management practices. This report is due by before March 1 of the calendar year.
Y	**N**	Supporting documentation used for the Notification of Compliance Status and Annual Notification of Changes Report is retained.
Y	**N**	Copies of all records, notifications, and equipment documentation required by Subpart 6H are kept on site for at least two years after the date of each record.
Y	**N**	Copies of all records, notifications, and equipment documentation required by Subpart 6H are retained for at least five years after the date of each record.

Notes:

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